

**AFFIDAVIT OF DUSTIN POULIN**

I, Special Agent Dustin Poulin, being duly sworn, depose and state that:

**INTRODUCTION**

1. I have been a Special Agent with the Federal Bureau of Investigation (“FBI”) since June 2015, and I am currently assigned to FBI’s Boston Field Office, specifically the North Shore Gang Task Force (“NSGTF”). I was previously assigned to the FBI Philadelphia Division, South Jersey Violent Offender and Gang Task Force, in Cherry Hill, New Jersey. As an FBI Special Agent, I am authorized to investigate violations of the laws of the United States, including violations of the federal narcotics laws in Title 21 of the United States Code. Prior to becoming a Special Agent, I served with the FBI since December 2009 as an Operation Support Technician and Staff Operations Specialist in the FBI Boston Division, Boston, Massachusetts.

2. As an FBI Special Agent, I have participated in narcotics investigations and debriefed or participated in the debriefings of defendants, informants, and witnesses who had personal knowledge of narcotics trafficking and gang organizations. I have participated in many aspects of narcotics investigations, including conducting physical and electronic surveillance, analyzing telephone toll information obtained through subpoenas, analyzing information obtained through court-ordered pen registers and trap and trace intercepts, overseeing the activities of and debriefing confidential human sources, and executing arrest and search warrants. I have coordinated controlled purchases of illegal drugs utilizing confidential sources and cooperating witnesses.

3. I have interviewed admitted drug traffickers, drug users, informants, cooperating defendants, and local, state, and federal law enforcement officers regarding the manner in which drug traffickers distribute, obtain, finance, store, manufacture, transport, and distribute illegal

drugs, including heroin, fentanyl, cocaine, and cocaine base. As such, I am familiar with the methods, routines, and practices of individuals involved in the use, sale, and trafficking of narcotics. I am also familiar with the various paraphernalia used to manufacture, compound, process, deliver, dispense, import and export, and use controlled substances such as methamphetamine, fentanyl, heroin, cocaine, marijuana, prescription medications, and other controlled substances. Based on my training and experience, I am familiar with the appearance, packaging, and texture of many controlled substances, including heroin, fentanyl, cocaine, and cocaine base.

**PURPOSE OF AFFIDAVIT**

4. I am submitting this affidavit in support of an application for a criminal complaint charging Vando GVOZDAREVIC (“GVOZDAREVIC”) with possession with intent to distribute 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(A)(viii). As will be explained more fully below, on November 10, 2021, agents executed a search warrant at GVOZDAREVIC’s residence and located over four kilograms of counterfeit Adderall pills that are believed to contain methamphetamine.

5. I personally have participated in this investigation since at least August 2021. I am familiar with the facts and circumstances of this investigation based upon, among other things: (a) my personal knowledge and involvement in this investigation; (b) my review of records related to this investigation; (c) information provided to me orally and in writing by other law enforcement agents; and (d) my experience and training as a criminal investigator.

6. Because this affidavit is submitted for the limited purpose of establishing probable cause to believe that GVOZDAREVIC possessed with intent to distribute 500 grams or more of a

mixture and substance containing methamphetamine, I have not included every detail known to me. Rather, I have included only those facts that I believe are sufficient to establish probable cause for the issuance of the requested criminal complaint. All times herein are approximate.

**PROBABLE CAUSE**

**Background of investigation**

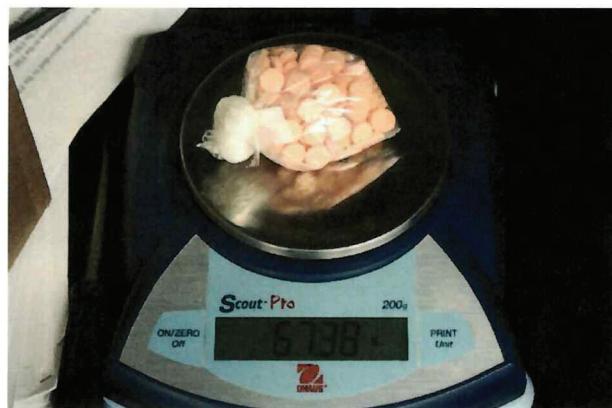
7. Between August 2021 and October 2021, agents conducted controlled purchases of counterfeit Adderall pills from Elijah Declet. Pills purchased from Declet on October 6, 2021 were analyzed at the Drug Enforcement Administration's laboratory and confirmed to contain methamphetamine. Declet is charged in a federal indictment for distribution of methamphetamine. *See* 21-cr-10204-GAO(s). During the course of this investigation, agents identified that GVOZDAREVIC was Declet's source of methamphetamine pills. As a result, I sought and obtained a search warrant for GVOZDAREVIC's residence at 96 Richardson Road, Apartment A14, Chelmsford, Massachusetts ("Target Location 3"). The affidavit in support of that search warrant is incorporated herein and attached as Exhibit A. *See* 21-mj-2737-2739-MBB.

**November 10, 2021: Agents seized approximately four kilograms of methamphetamine pills from Target Location 3**

8. On November 10, 2021, agents executed a federal search warrant at Target Location 3. 21-mj-2739-MBB. Upon execution, agents conducted a safety sweep for occupants of the apartment. Agents identified GVOZDAREVIC and his girlfriend as the only occupants. Following Miranda warnings, an agent asked GVOZDAREVIC where the drugs were. GVOZDAREVIC directed the agent to the living room closet.

9. In the living room closet, agents located and seized five, gallon-sized bags of pills. One bag appeared to contain blue counterfeit oxycodone pills. The other four bags appeared to be

counterfeit Adderall pills, similar in appearance to counterfeit Adderall pills that were purchased from Declet. I have attached photographs of pills purchased from Declet on October 6, 2021 and some of the pills seized from Target Location 3. The pills seized from Target Location 3 field tested positive for methamphetamine. The preliminary weight of the four bags is 4,387 grams. This amount of drugs, as well as their packaging, are consistent with distribution.



Photograph 1: Counterfeit Adderall pills purchased from Declet on October 6, 2021 that were confirmed to contain methamphetamine.



Photograph 2: Suspected counterfeit Adderall pills seized from Target Location 3.

**CONCLUSION**

10. Based upon the evidence set forth above, as well as my training and experience, I submit that there is probable cause to believe that on November 10, 2021, GVOZDAREVIC possessed with intent to distribute 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine, in violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(A)(viii). Accordingly, I respectfully request that a criminal complaint charging RODERICK with a violation of 21 U.S.C. § 841(a)(1) and 841(b)(1)(A)(viii) be issued.



Dustin Poulin  
Special Agent  
Federal Bureau of Investigation

ATTESTED and SWORN to before me telephonically in accordance with the requirements of Fed. R. Crim. P. 4.1 on November 10, 2021.



*Marianne B. Bowler vs m*  
Hon. Marianne B. Bowler  
United States Magistrate Judge  
District of Massachusetts